

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,	)	<b>INDICTMENT</b> <i>CR 12-172SRN/AJB</i>
	)	
Plaintiff,	)	(18 U.S.C. § 2)
	)	(18 U.S.C. § 922(g))
v.	)	(18 U.S.C. § 924(c))
	)	(18 U.S.C. § 924(d))
(1) MICHAEL BROOKS BYNUM,	)	(18 U.S.C. § 981(a))
	)	(18 U.S.C. § 1951)
(2) RAY JAMES BROWN, and	)	(18 U.S.C. § 2118(a))
	)	(28 U.S.C. § 2461(c))
(3) RAYSHAWN EARL JAMES BROWN,	)	
	)	
	)	
Defendants.	)	

THE UNITED STATES GRAND JURY CHARGES THAT:

**COUNT 1**

(Interference with Commerce by Robbery - "Hobbs Act")

On or about April 3, 2012, in the State and District of  
Minnesota, the defendants,

**MICHAEL BROOKS BYNUM,  
RAY JAMES BROWN, and  
RAYSHAWN EARL JAMES BROWN,**

aiding and abetting each other, did unlawfully obstruct, delay, and  
affect, and attempt to obstruct, delay, and affect, commerce as  
that term is defined in Title 18, United States Code, Section 1951,  
and the movement of articles and commodities in such commerce, by  
robbery as that term is defined in Title 18, United States Code,  
Section 1951, in that the defendants did unlawfully take and obtain  
personal property consisting of prescription controlled substances  
from the person and immediate presence of employees of the West 7th

SCANNED

JUL 11 2012

U.S. DISTRICT COURT ST. PAUL

FILED JUL 10 2012  
RICHARD D. SLETTER, CLERK  
JUDGMENT ENTD.  
DEPUTY CLERK

U.S. v. Michael Brooks Bynum, et al.

Pharmacy, against the employees' will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees' person and property, that is, the defendants used a firearm to compel employees of the West 7th Pharmacy, a business engaged in interstate commerce, to relinquish to the defendants prescription controlled substances belonging to the business, all in violation of Title 18, United States Code, Sections 1951 and 2.

**COUNT 2**

(Robbery Involving Controlled Substances)

On or about April 3, 2012, in the State and District of Minnesota, the defendants,

**MICHAEL BROOKS BYNUM,  
RAY JAMES BROWN, and  
RAYSHAWN EARL JAMES BROWN,**

aiding and abetting each other, did knowingly and unlawfully take from the person and presence of another by force, violence, and intimidation, a material and compound containing a quantity of a controlled substance having a replacement value exceeding five hundred dollars (\$500), which controlled substances were in the custody, care, control, and possession of a pharmacist registered with the Drug Enforcement Administration, all in violation of Title 18, United States Code, Sections 2118(a) and 2.

U.S. v. Michael Brooks Bynum, et al.

**COUNT 3**

(Possession of Firearm in Furtherance of a Crime of Violence)

On or about April 3, 2012, in the State and District of Minnesota, the defendants,

**MICHAEL BROOKS BYNUM,  
RAY JAMES BROWN, and  
RAYSHAWN EARL JAMES BROWN,**

aiding and abetting each other, did knowingly and unlawfully possess a firearm, specifically, a Glock brand model 23, .40 caliber semi-automatic pistol, serial number BLG810US, in furtherance of a crime of violence which may be prosecuted in a court of the United States; that is the armed robbery described in Count 1 of the Indictment, all in violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT 4**

(Possession of Firearm in Furtherance of a Crime of Violence)

On or about April 3, 2012, in the State and District of Minnesota, the defendants,

**MICHAEL BROOKS BYNUM,  
RAY JAMES BROWN, and  
RAYSHAWN EARL JAMES BROWN,**

aiding and abetting each other, did knowingly and unlawfully possess a firearm, specifically, a Glock brand model 23, .40 caliber semi-automatic pistol, serial number BLG810US, in furtherance of a crime of violence which may be prosecuted in a court of the United States; that is the armed robbery described in

U.S. v. Michael Brooks Bynum, et al.

Count 2 of the Indictment, all in violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT 5**

(Felon in Possession of Firearm)

On or about April 3, 2012, in the State and District of Minnesota, the defendant,

**MICHAEL BROOKS BYNUM,**

having previously been convicted of crimes punishable by imprisonment for a term exceeding one year, namely:

CHARGE	YEAR OF CONVICTION	JURISDICTION
Aggravated Robbery	2000	Hennpin County, Minnesota
Felon In Possession	2006	District of Minnesota

aiding and abetting others known and unknown, did knowingly and intentionally possess in and affecting interstate commerce, a firearm, specifically a Glock brand model 23, .40 caliber semi-automatic pistol, serial number BLG810US, all in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

**COUNT 6**

(Felon in Possession of Firearm)

On or about April 3, 2012, in the State and District of Minnesota, the defendant,

**RAY JAMES BROWN,**

U.S. v. Michael Brooks Bynum, et al.

having previously been convicted of crimes punishable by imprisonment for a term exceeding one year, namely:

CHARGE	YEAR OF CONVICTION	JURISDICTION
First Degree Burglary	2006	Hennpin County, Minnesota
Felon In Possession	2008	District of Minnesota

did knowingly and intentionally possess in and affecting interstate commerce, a firearm, specifically a Glock brand model 23, .40 caliber semi-automatic pistol, serial number BLG810US, all in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT 7**

(Interference with Commerce by Robbery - "Hobbs Act")

On or about February 18, 2012, in the State and District of Minnesota, the defendant,

**RAY JAMES BROWN,**

aiding and abetting others known and unknown, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendant did unlawfully take and obtain personal property consisting of prescription controlled substances from the person and immediate

U.S. v. Michael Brooks Bynum, et al.

presence of employees of Lloyds Pharmacy, against the employees' will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees' person and property, that is, the defendant used a firearm to compel employees of Lloyds Pharmacy, a business engaged in interstate commerce, to relinquish to the defendant prescription controlled substances belonging to the business, all in violation of Title 18, United States Code, Sections 1951 and 2.

**COUNT 8**

(Possession of Firearm in Furtherance of a Crime of Violence)

On or about February 18, 2012, in the State and District of Minnesota, the defendant,

**RAY JAMES BROWN,**

aiding and abetting others known and unknown, did knowingly and unlawfully possess a firearm in furtherance of a crime of violence which may be prosecuted in a court of the United States; that is the armed robbery described in Count 7 of the Indictment, all in violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT 9**

(Interference with Commerce by Robbery - "Hobbs Act")

On or about March 15, 2012, in the State and District of Minnesota, the defendant,

**RAY JAMES BROWN,**

U.S. v. Michael Brooks Bynum, et al.

aiding and abetting others known and unknown, did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully take and obtain personal property consisting of prescription controlled substances from the person and immediate presence of employees of the Best Aid Pharmacy against the employees' will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees' person and property, that is, the defendants used a firearm to compel employees of Best Aid Pharmacy, a business engaged in interstate commerce, to relinquish to the defendant prescription controlled substances belonging to the business, all in violation of Title 18, United States Code, Sections 1951 and 2.

**COUNT 10**

(Possession of Firearm in Furtherance of a Crime of Violence)

On or about March 15, 2012, in the State and District of Minnesota, the defendant,

**RAY JAMES BROWN,**

aiding and abetting others known and unknown, did knowingly and unlawfully possess a firearm in furtherance of a crime of violence which may be prosecuted in a court of the United States; that is

U.S. v. Michael Brooks Bynum, et al.

the armed robbery described in Count 9 of the Indictment, all in violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT 11**

(Interference with Commerce by Robbery - "Hobbs Act")

On or about March 27, 2012, in the State and District of Minnesota, the defendant,

**RAY JAMES BROWN,**

aiding and abetting others known and unknown, did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully take and obtain personal property consisting of prescription controlled substances from the person and immediate presence of employees of Pro Pharmacy against the employees' will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees' person and property, that is, the defendant used a firearm to compel employees of Pro Pharmacy, a business engaged in interstate commerce, to relinquish to the defendant prescription controlled substances belonging to the business, all in violation of Title 18, United States Code, Sections 1951 and 2.



U.S. v. Michael Brooks Bynum, et al.

**COUNT 12**

(Possession of Firearm in Furtherance of a Crime of Violence)

On or about March 27, 2012, in the State and District of Minnesota, the defendant,

**RAY JAMES BROWN,**

aiding and abetting others known and unknown, did knowingly and unlawfully possess a firearm in furtherance of a crime of violence which may be prosecuted in a court of the United States; that is the armed robbery described in Count 11 of the Indictment, all in violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**FORFEITURE ALLEGATIONS**

Counts 1 through 12 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 924(d)(1) and 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses alleged in Counts 1, 7, 9 and 11 of this Indictment, the defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violations charged in Counts 1, 7, 9 and 11 of this Indictment.

U.S. v. Michael Brooks Bynum, et al.

Upon conviction of the offenses alleged in any of the Counts of this Indictment, the defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), any firearm with accessories or any ammunition involved in our used in the violations charged, including a Glock brand model 23, .40 caliber semi-automatic pistol, serial number BLG810US.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All in violation of Title 18, United States Code, Sections 2, 922(g)(1), 924(d)(1), 924(c)(1), 981(a)(1)(C), and 1951(a) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON